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7 Attorney for Robert Carl Kindell

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 ROBERT CARL KINDELL,
15

Defendant.

Case No. 3:23-cr-00039-ART-CLB

STIPULATION TO VACATE
STATUS CONFERENCE
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Andrew Keenan, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,
20 Assistant Federal Public Defender, counsel for Robert Carl Kindell, that the Status Conference
21 currently scheduled on May 16, 2024, be vacated.

22 This Stipulation is entered into for the following reasons:

- 23 1. Mr. Kindell recently appeared before the Honorable Judge Traum and pleaded
24 guilty to Count 1 of the Indictment.
25 2. Sentencing in this matter has been scheduled for August 1, 2024, with the
26 possibility that it is advanced to an earlier date. It is expected Mr. Kindell will be transported
from the NSDC to a BOP facility after that date.

1 3. To avoid any delays between surgery and physical therapy or other disruptions
2 to care that may emerge as a result of transfer between facilities, Mr. Kindell has opted to
3 receive the necessary surgery after he arrives in BOP custody.

4 4. The parties therefore respectfully request that the status check in this matter be
5 vacated.

6 This is the first request to vacate the status conference.

7 DATED this 9th day of May, 2024.

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9 RENE L. VALLADARES
10 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

11 By /s/ Joy Chen

12 JOY CHEN
13 Assistant Federal Public Defender

 By /s/ Andrew Keenan

 ANDREW KEENAN
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4 Plaintiff,
5 v.
6 ROBERT CARL KINDELL,
7 Defendant.
8

Case No. 3:23-cr-00039-ART-CLB
ORDER

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10 IT IS THEREFORE ORDERED that the status conference currently scheduled for
11 Thursday, May 16, 2024 at 10:00 a.m., be vacated.

12 DATED this 13 day of May, 2024.

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15 UNITED STATES MAGISTRATE JUDGE
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